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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

MAINE STATE RETIREMENT SYSTEM,
Individually and On Behalf of All Others
Similarly Situated,

Plaintiff,

v.

COUNTRYWIDE FINANCIAL
CORPORATION, *et al.*

Defendants.

No. 2:10-CV-00302 MRP
(MAN)

CLASS ACTION

**DECLARATION OF JULIE
GOLDSMITH REISER IN
SUPPORT OF PLAINTIFFS'
OPPOSITION TO BANK OF
AMERICA CORPORATION
AND NB HOLDING
CORPORATION'S MOTION
TO DISMISS**

Date: October 18, 2010
Time: 11:00 a.m.
Courtroom: 12
Judge: Hon. Mariana R.
Pfaelzer

No. 2:10-cv-00302: DECLARATION OF JULIE GOLDSMITH REISER IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO BANK OF AMERICA CORPORATION AND NB
HOLDING CORPORATION'S MOTION TO DISMISS

DECLARATION OF JULIE GOLDSMITH REISER

I, Julie Goldsmith Reiser, declare as follows:

1. I am a partner of the law firm of Cohen Milstein Sellers & Toll PLLC, Lead Counsel for the Class, and am admitted *pro hac vice* to practice before this Court. I submit this declaration and accompanying exhibits in support of Plaintiffs' Opposition to Bank of America Corporation and NB Holding Corporation's Motion to Dismiss.

2. Attached hereto are true and correct copies of the following documents:

Exhibit A: Bank of America Corporation Press Release, April 27, 2009;

Exhibit B: Rick Rothacker, *BofA Exec Tackles Countrywide*, Charlotte Observer (Oct. 21, 2008);

Exhibit C: Bank of America Corporation's Form 11-K, filed June 26, 2009;

Exhibit D: Shayndi Raice and Marshall Eckblad, *Countrywide's Mess Billed to Bank of America*, Dow Jones Newswires (June 7, 2010);

Exhibit E: Julie Creswell, *Bank of America Joins Parade of Mortgage-Related Losses*, New York Times (Jan. 23, 2008);

Exhibit F: Bank of America Countrywide Acquisition Announcement Call Transcript, January 11, 2008;

Exhibit G: Amy Miller, *Countrywide in Crosshairs as Mortgage Crisis Fuels Litigation*, Corporate Counsel (Feb. 22, 2008);

Exhibit H: Testimony of Brian T. Moynihan to Financial Crisis Inquiry Commission (Jan. 13, 2010);

Exhibit I: *MBIA Ins. Corp. v. Countrywide Home Loans, Inc.*, No. 602825/08 (N.Y. Apr. 29, 2010);

Exhibit J: *Argent Classic Convertible Arbitrage Fund L.P. v. Countrywide Financial Corporation*, No. 07-cv-07097-MRP (MANx) (C.D. Cal. Mar. 19, 2009).

I declare, under penalty of perjury, that the foregoing is true and correct to the best of my knowledge.

Dated: September 16, 2010



Julie Goldsmith Reiser

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**PROOF OF SERVICE VIA ELECTRONIC POSTING PURSUANT TO
CENTRAL DISTRICT OF CALIFORNIA LOCAL RULES
AND ECF GENERAL ORDER NO. 10-07**

I, the undersigned, say:

I am a citizen of the United States and am employed in the office of a member of the Bar of this Court. I am over the age of 18 and not a party to the within action. My business address is 1801 Avenue of the Stars, Suite 311, Los Angeles, California 90067.

On September 16, 2010, I caused to be served the following document:

- 1. OPPOSITION TO BANK OF AMERICA CORPORATION AND NB HOLDING CORPORATION'S MOTION TO DISMISS**
- 2. DECLARATION OF JULIE GOLDSMITH REISER IN SUPPORT OF PLAINTIFFS' OPPOSITION TO BANK OF AMERICA CORPORATION AND NB HOLDING CORPORATION'S MOTION TO DISMISS**

By posting the document to the ECF Website of the United States District Court for the Central District of California, for receipt electronically by the parties as listed on the attached Service List.

And on any non-ECF registered party:

By Mail: By placing true and correct copies thereof in individual sealed envelopes, with postage thereon fully prepaid, which I deposited with my employer for collection and mailing by the United States Postal Service. I am readily familiar with my employer's practice for the collection and processing of correspondence for mailing with the United States Postal Service. In the ordinary course of business, this correspondence would be deposited by my employer with the United States Postal Service that same day.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on September 16, 2010, at Los Angeles, California.

s/Michael Goldberg
Michael Goldberg

Mailing Information for a Case 2:10-cv-00302-MRP -MAN**Electronic Mail Notice List**

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Manual Notice List

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The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

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